

## *EXHIBIT D*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

RYSTA LEONA SUSMAN, both  
individually and as Legal Guardian of  
SHANE ALLEN LOVELAND, et al.,

Plaintiffs,

V.

THE GOODYEAR TIRE & RUBBER  
COMPANY,

Defendant.

Case No. 8:18-cv-00127

**DECLARATION OF EDWARD S. BOTT, JR. IN SUPPORT OF  
THE GOODYEAR TIRE & RUBBER COMPANY'S BRIEF IN SUPPORT OF  
DEFENDANT'S MOTION TO EXCLUDE  
PLAINTIFFS' FAILURE TO WARN EXPERT, LILA F. LAUX**

I, Edward S. Bott, Jr., declare as follows:

1. My name is Edward S. Bott Jr. I understand the nature of this oath, and I am competent to testify to the matters stated in this Declaration. This testimony is based on my own personal knowledge, and the facts stated herein are true and correct.

2. True and accurate copies of each of the documents identified as exhibits in The Goodyear Tire & Rubber Company's Brief in Support of Defendant's Motion to Exclude Plaintiffs' Failure to Warn Expert, Lila F. Laux are attached to the Index in Support of The Goodyear Tire & Rubber Company's Brief in Support of Defendant's Motion to Exclude Plaintiffs' Failure to Warn Expert, Lila F. Laux.

Pursuant to 28 U.S.C. SECTION 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 12th day of August, 2019, in St. Louis, Missouri.

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EDWARD S. BOTT, JR.